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August 22, 2001

EXECUTIVE SELECTARY

Mr. David Waddell **Executive Secretary** Tennessee Regulatory Authority 360 James Robertson Parkway Nashville, TN 37201

Re:

BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA) Service in Tennessee Pursuant to Section 271 of the

Telecommunications Act of 1996

Docket No. 97-00309

Dear David:

On August 21, 2001, the intervening carriers in the above-captioned proceeding collectively submitted discovery requests to BellSouth Telecommunications, Inc. The request was filed on behalf of Covad Communications, Inc., MCI WorldCom, Inc., XO Tennessee, Inc., Time Warner, AT&T Communications of the South Central States, Inc. and the Southeastern Competitive Carriers Association. The first page of the Interrogatories inadvertently contained the wrong caption. Please accept for filing a corrected first page to be inserted in place of the previous one submitted on August 21, 2001.

Copies have been forwarded to parties of record.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By: Henry Walker Walker

HW/nl Enclosure

## BEFORE THE TENNESSEE REGULATORY AUTHORITY NASHVILLE, TENNESSEE

Re:	BellSouth Telecommunications, Inc.'s Entry	)	
	Into Long Distance (InterLATA) Service in	)	Docket No. 97-00309
	Tennessee Pursuant to Section 271 of the	)	
	Telecommunications Act of 1996	)	

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC., THE SOUTHEASTERN COMPETITIVE CARRIERS ASSOCIATION, BROOKS FIBER COMMUNICATIONS OF TENNESSEE, INC., MCIMETRO ACCESS TRANSMISSION SERVICES, LLC, TIME WARNER OF THE MID-SOUTH, LP, XO TENNESSEE, INC. AND DIECA d/b/a COVAD COMMUNICATIONS COMPANY'S FIRST DATA REQUEST TO BELLSOUTH TELECOMMUNICATIONS, INC.

AT&T Communications of the South Central States, Inc. ("AT&T"), the Southeastern Competitive Carriers Assocation ("SECCA"), Brooks Fiber Communications of Tennessee, Inc. ("Brooks Fiber") and McImetro Access Transmission Services, LLC ("McImetro"), (collectively "WorldCom"), Time Warner Telecom of the Mid-South, LP, ("Time Warner"), XO Tennessee, Inc. ("XO"), and DIECA d/b/a Covad Communications Company ("Covad") serve upon BellSouth Telecommunications, Inc. ("BellSouth") the following written interrogatories to be answered under oath by an officer or agent of BellSouth on or before September 4, 2001.

## INSTRUCTIONS FOR USE AND DEFINITIONS

1. All information is to be divulged which is in the possession of BellSouth, its attorneys, investigators, agents, employees, or other representatives of BellSouth and/or its attorneys.

## CERTIFICATE OF SERVICE

I hereby certify that on the 22<sup>nd</sup> day of August, 2001, a copy of the foregoing document was served on the parties of record, via hand-delivery, overnight delivery or U.S. Mail, postage prepaid, addressed as follows:

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Henry whether